

**6/29/04 Meeting Notes – Landfill Stability Workgroup
Bluff Conference Room – South Central Region Headquarters**

Attending: Sherren Clark (BT²), Gerard Hamblin (WMWI), Toral Jha (GRRN), John Melby (DNR), Gene Mitchell (DNR), John Reindl (Dane County), Brad Wolbert (DNR).

I. Review and Update of Proposed Rule Efforts

- DNR received approval from NR Board last week to go to hearings with a rule package that includes:
 - leachate line design practices, including allowing > 1200' lengths
 - all LFs required to submit plan by 1/1/07 to significantly reduce degradable organic material remaining after site closure
 - standard leachate recirculation specs
 - implementation of federal Research Development & Demonstration (RD&D) permits for certain landfill practices
- Green sheet rules package (handed out) includes 2 alternatives for RD&D permits; DNR will wait for comment before choosing between them or crafting a combination:
 - "Landfilled Waste Stabilization Plan" which would allow RD&D permit for liquids additions only (this is different from the organics reduction plan that would be required by 1/1/07 from all landfills)
 - "Research Plan" which would allow RD&D permit for liquids addition, allowing run-on water into waste, or allowing permeable final covers
- Upgraded leachate line standards would apply to all lines, not just those > 1200 feet – tech workgroup recommended this approach
- Phase-in of new standards: existing plan approvals will govern, but staff may implement rules as conditions of approval or as plan mods once approved. Staff need to be cautious about implementing draft rules before promulgation, e.g., resistivity testing, but may consider case-by-case.
- Schedule includes:
 - start to draft guidance for implementing rule changes mid-July
 - hearings in Stevens Point and Madison August 17-18 (tentative)
 - comment period (written and on-line) closes ~ Sept. 17
 - TAC meeting to consider public comments after comment period
 - goal is to go to NR Board for approval in November 2004 with submittal to Legislature Jan. 15, 2005.

II. Review and Agree on Goals of Workgroup

- Suggested goal of group is to put together recommendations for what constitutes an approvable organic reduction plan under the proposed rule – i.e., what separates a good plan from a sham plan.
- Could adopt strategy-specific approach, listing menu of acceptable strategies for reducing degradable organics and setting standards for each strategy (similar to technology-based air quality permits).
- Alternatively (perhaps complementarily), could establish numerical endpoints for gas, leachate, land use and allow owners flexibility on how to achieve.
- Issues discussed:
 - Measurement – actual degradable organics vs diversion rate
 - Need for a consequence if reduction not accomplished
 - Must consider secondary impacts and risks created by, e.g., diverting organic wastes away from LF to other management options – seek “net lower risk” (e.g., risks of incineration or unregulated composting)
 - How to apply to past and current generations of facilities
 - Each facility will probably will need combination of strategies
 - With numerical standard, won’t know if LF reached standard until end of timeframe – too late
 - Difference between measuring compliance with plan and effectiveness
 - Can’t really measure simple things like organic degradation rate, so won’t know if plan will lead to achieving endpoint
- End goal – reach biological stability within reasonable timeframe, e.g., 40 years.
- Group tentatively settled on strategy-by-strategy approach as basis for rule development – “if you implement these strategies in the following ways, you’ve met the plan requirement.” Recognize that this implies an iterative approach: implement the approved plan, measure and see how effective, change the plan accordingly.

III. Review and Discuss “Strategies for Waste Stabilization in Landfills” Table

- Updated table handed out; includes additional strategies and evaluation factors
- Issues discussed:
 - Need to firmly define each strategy
 - Will all plans need to consider certain strategies, e.g., broad categories like diversion?
 - LF operator may not be able to impose certain strategies on customers (either due to lack of authority or ability of customer to go elsewhere)
 - should not limit strategies; can’t predict future technologies
 - should be able to mix & match strategies

- some strategies may require input from folks not included in workgroup
- Need a problem statement to evaluate our work
- Need to set criteria for evaluating alternative strategies; may include:
 - impacts on gas, water quality, land
 - timeframe
 - sustainability
 - secondary impacts
 - economics
 - implementability (by LF operator; by DNR)
 - EMS principles (broadly)

IV. Decide on Format and Schedule of Follow-Up Meetings

- Rule in place by 1/1/07 would suggest rulemaking to start ~ 1/1/06
- Next 3 meetings, all at DNR – SCR at 1:00 p.m.: 7/29; 8/26; 9/30
 - pre-7/29: Develop problem statement via email
 - 7/29 mtg: Agree on problem statement; clearly define each strategy; set priorities for gathering info; develop criteria for evaluating each strategy
 - 8/26 mtg: Assess pros/cons and impacts/risks; try to look at how strategies fit together; agree on list of viable strategies and combinations
 - 9/30 mtg: Discuss standards for the viable strategies
- Public info needed to ensure transparent process: suggestion to put problem statement and other work products on website as they are developed.